Contents

1 INTRODUCTION .................................................................................................................. 2
1.1 Purpose of this Statement ............................................................................................ 2

2 MATTER 3: THE SPATIAL STRATEGY ............................................................................. 3
2.1 Issue: Is the spatial strategy and settlement hierarchy as set out in Policies TLP01, TLP06, TLP07, TLP08 and TLP09 justified as the most appropriate strategy and is it based on robust evidence? ........................................................................................................... 3
1  Introduction

1.1  Purpose of this Statement

1.1.1  These comments are prepared on behalf of Countryside Properties Ltd ('Countryside') in respect of the Tandridge District Council Local Plan Examination. They respond to the initial Matters, Issues and Questions (MIQ’s) set by the inspector on 4th July 2019. Specifically, they respond to Matter 3 ('The Spatial Strategy').

1.1.2  Countryside are promoting Land south of Smallfield (site reference: SMA21). Nonetheless, the comments contained herewith relate only to the initial questions raised by the inspector.

1.1.3  In formulating these additional comments, we acknowledge that the Government published the revised National Planning Policy Framework in February (NPPF) 2019. However, as the Council chose to submit its plan before 24th January 2019, the policies in the original 2012 framework apply to this Examination. On this basis, any reference to the NPPF relates to the 2012 publication and to be sound it must be:

- Positively prepared – the plan should seek to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.1.4  In formulating this response, we have addressed the Inspector’s questions directly and recapped our Regulation 19 concerns.
2 Matter 3: The Spatial Strategy

2.1 Issue: Is the spatial strategy and settlement hierarchy as set out in Policies TLP01, TLP06, TLP07, TLP08 and TLP09 justified as the most appropriate strategy and is it based on robust evidence?

*Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?*

2.1.1 The focus of growth has been towards the highest tier 1&2 settlements and longer term to new settlement at South Godstone.

2.1.2 We do not object to the creation of a new settlement for provision of housing in the long term, but we consider limited reliance should be placed on its delivery for the current plan period. Much work still needs to be undertaken on the land and it is far from being evidenced as a deliverable or developable site. Accordingly, the 1,400 homes relied upon from South Godstone should be directed instead to established settlements on a proportionate basis.

2.1.3 The release of such Green Belt land in this way is wholly justified given the lack of urban opportunities, the unmet housing need and lack of supply, which cumulatively combine to represent ‘Exceptional Circumstances’ to amend Green Belt boundaries. The Council already accepts this matter in principle.

2.1.4 Despite this being the obvious and most appropriate approach, the Council appears to have under allocated land and failed to properly analyse what scale of growth should be directed to respective settlements based on their own individual sustainability credentials. For example, we see no compelling evidence that the release of additional logical greenfield land, such as that controlled by our client in Smallfield, would be so harmful that it would outweigh the associated benefits. Furthermore, much benefit could occur within lower tier settlements with an injection of growth supported by the provision of additional new infrastructure.

2.1.5 Overall, the plan and associated evidence fails to recognise the benefits that housing brings. The NPPF is clear that in rural areas planning policies and decisions should be responsive to local circumstances and achieving sustainable development. However, little regard has been had to these important objectives and the standard approach appears to be the provision of minimal housing and preservation of settlements rather than evolution.

2.1.6 In summary, it is our view that the strategy has been based around an inadequate release of land rather than a genuine desire to provide the right amount of homes in the right locations.

2.1.7 In terms of whether ‘reasonable alternatives’ have been considered, the SA (SSHA2-5) tests various growth options that would deliver different levels of development when combined with tier 1&2 expansion and a new settlement. However, it does not appear to the release of sustainable Greenfield land has not been fully appraised as part of this process.

2.1.8 In conclusion, we do not consider all reasonable options have been considered in devising the strategy and we respectfully request Main Modifications be imposed.
to increase the level of growth and to disperse this amounts settlements on a proportionate basis.